

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Methyl Tertiary-Butyl Ether
("MTBE") Products Liability
Litigation

Master File No. 1:00-1898
(SAS) MDL No. 1358

This document pertains to:

*Commonwealth of Pennsylvania v. Exxon
Mobil Corporation, et al.*, Case No. 14-cv-
06228

**STIPULATION OF DISMISSAL OF INSURANCE CLAIMS AGAINST CHEVRON
CORPORATION, CHEVRON U.S.A. INC., TEXACO INC., AND TRMI-H LLC**

WHEREAS Plaintiffs have agreed to dismiss with prejudice their insurance claims (as defined below) against Chevron Corporation, Chevron U.S.A. Inc., Texaco Inc., and TRMI-H LLC (collectively, "Chevron");

WHEREAS the parties have agreed to jointly request that the Court enter the attached proposed order of dismissal:

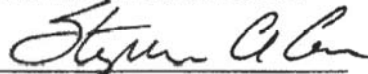
THE PARTIES HEREBY STIPULATE AND AGREE that Count VIII (unjust enrichment) and Count IX (Pennsylvania Storage Tank and Spill Prevention Act) of the Second Amended Complaint, filed November 6, 2015, which collectively are defined as the "Insurance Claims," are dismissed with prejudice as to Chevron. All other claims in the Second Amended Complaint are unaffected by this Stipulation. Specifically, Chevron remains a "MTBE Defendant" as stated in Paragraph 122 of the Second Amended Complaint, and all other remaining claims against Chevron are maintained. All remaining claims against the other Defendants in the Second Amended Complaint are maintained.

THE PARTIES FURTHER STIPULATE AND AGREE that each of the parties to this stipulation shall bear and pay its own costs, expenses, and attorneys' fees heretofore incurred in connection with the claims made against Chevron in Counts VIII and IX of the Second Amended Complaint.

SO STIPULATED.

Dated: May 2, 2019

THE COMMONWEALTH OF
PENNSYLVANIA, BY AND THROUGH
PENNSYLVANIA ATTORNEY GENERAL,
THE PENNSYLVANIA INSURANCE
DEPARTMENT, THE PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL
PROTECTION, AND THE PENNSYLVANIA
UNDERGROUND STORAGE TANK
INDEMNIFICATION FUND

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CHEVRON

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